

LAW OFFICE OF
MARC FERNICHMARC FERNICH
ALSO ADMITTED IN MASSACHUSETTS570 LEXINGTON AVENUE, 16TH FLOOR
NEW YORK, NEW YORK 10022
(212) 446-2346
FAX: (212) 446-2330
E-MAIL: MFernEsq@aol.com

August 22, 2005

BY FAX (718) 260-2457Hon. John Gleeson
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201**FILED**
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ AUG 30 2005 ★

BROOKLYN OFFICE

Re: *United States v. Julio Carreras*, 05 CR 243 (JG) (E.D.N.Y.)

Dear Judge Gleeson:

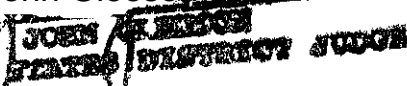
I represent the above-named defendant and cooperating witness, who apparently is scheduled to be sentenced before Your Honor Aug. 26. I write to respectfully request an adjournment pending my completion of trial before Judge Scheindlin in *United States v. John A. Gotti*, 04 Cr. 690 (SAS) (S.D.N.Y.). We are working five days a week in the Gotti trial, which began Aug. 8 and is expected to last through at least mid-September. Because of this actual engagement, I have not had an opportunity to review the presentence report with Mr. Carreras or prepare a written submission on his behalf. To my knowledge, moreover, the government has yet to file a U.S.S.G. § 5K1.1 motion for my client. For these reasons, I respectfully ask the Court to postpone Mr. Carreras's sentencing until after the Gotti trial. Despite several phone calls, I have been unable to reach AUSA Jed Davis to secure his consent to this request. I thank the Court for its attention and consideration.

Respectfully yours,


Marc Fernich

cc: AUSA Jed Davis (718) 254-7480

s/John Gleeson


JOHN GLEESON
UNITED STATES DISTRICT JUDGE*Sentencing is
order 10/28/05
@ 2:00 PM*